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April 15, 2024

VIA ECF
Hon. Jose R. Almonte, U.S.M.J.
US District Court for the District of New Jersey
Newark, New Jersey

Re: **David Lorenzo v. Borough of Palisades Park et. al.**
Case No.: 2:23-cv-21849

Dear Judge Almonte:

As Your Honor is aware, this office represents the Borough of Palisades Park, Mayor Kim and Councilman Min with regard to the above matter. As per Your Honor's direction at the Rule 16 Initial Conference, We would accept that the Court enter the Plaintiff's Amended Complaint, and allow the Defendants to proceed with filing responsive pleadings thereto.

With the filing of the Amended Complaint, there will be additional counsel that will need to be assigned to the new defendants as they are served with the Complaint. I can represent that counsel has been chosen, and when the complaint is served upon each, new counsel will be quickly assigned. We further advise that the Defendant's maintain that our motion to dismiss is grounded in law, but with the Amended Complaint, a more detailed motion to dismiss would be filed, addressing the merits of the new claims. As such, we propose that the motion to dismiss would be filed 30 days from the entry of the Amended Complaint.

Lastly, with regard to the deadlines to propound discovery, we ask that these deadlines be extended by 30 days to permit new counsel to enter for the new Defendants and analyze the complaint and propound discovery.

I thank Your Honor for your time and attention, of your Honor wishes to conference this issue, I am available to do so.

Very truly yours,

R. Scott Fahrney, Esq.

RSF/koh
CC: All Counsel of Record via ECF